

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2003-326-C**

IN RE:

Analysis of Continued Availability of Unbundled)
Local Switching for Mass Market Customers)
Pursuant to the Federal Communication)
Commission's Triennial Review Order)
_____)

**PBT COMMUNICATIONS, INC.'S OBJECTIONS AND RESPONSES TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES (Nos. 1-84)**

PBT Communications, Inc. ("PBT"), pursuant to the South Carolina Rules of Civil Procedure, the South Carolina Public Service Commission's Rules of Practice and Procedure (S.C. Code of Regulations R. 103-800, *et seq.*), and Commission Order No. 2003-730 ("Procedural Order"), objects generally and specifically to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories ("BellSouth's Interrogatories") to PBT, served on December 8, 2003 as described below, and provides the responses to BellSouth's Interrogatories as set forth below.

PBT reserves the right to amend, supplement, or revise these objections, and assert additional objections, should PBT discover additional grounds for objecting at any time prior to hearing.

General Objections to BellSouth's Interrogatories

1. PBT objects to BellSouth's Interrogatories to the extent that the interrogatories are overly broad, lack specificity, are unduly burdensome or excessively time-consuming, or are

irrelevant and not likely to lead to the discovery of admissible evidence pursuant to the Procedural Order, the South Carolina Rules of Civil Procedure, or applicable South Carolina law.

2. PBT objects to BellSouth's Interrogatories to the extent that the interrogatories seek discovery of information protected by attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege.

3. PBT objects to BellSouth's Interrogatories to the extent that the interrogatories purport to impose discovery obligations on PBT beyond the scope of what is permitted under the Procedural Order, the South Carolina Rules of Civil Procedure, or applicable South Carolina law.

4. PBT objects to BellSouth's Interrogatories to the extent that the interrogatories purport to seek discovery of matters other than those subject to the jurisdiction of the Commission pursuant to the Federal Communications Commission's ("FCC") Triennial Review Order ("TRO") or applicable South Carolina law.

5. PBT objects to all Interrogatories that require the disclosure of information that already is in the public domain, that is in the possession of BellSouth or is readily obtainable by BellSouth, or that is otherwise on record with the Commission or the FCC.

6. PBT objects to BellSouth's Interrogatories to the extent that the interrogatories seek information and discovery of facts known and opinions held by experts acquired and/or developed in anticipation of litigation or for hearing and outside the scope of discoverable information pursuant to the South Carolina Rules of Civil Procedure or applicable South Carolina law.

7. PBT objects to BellSouth's Interrogatories to the extent that they request specific financial, business or proprietary information regarding PBT's economic business model, on

the grounds that those requests presume that the market entry analysis is contingent upon PBT's economic business model instead of the hypothetical business model contemplated by the TRO.

8. PBT objects to BellSouth's definitions of "hot cut," "batch hot cut," "individual hot cut," "coordinated cut over" and "coordinated time-specific cut over" and each and every interrogatory that includes such terms, as such definitions are vague and not adequately defined in that it is not clear whether or to what extent BellSouth's practices are consistent with the FCC's use of such terms. The reference in BellSouth's definition of "hot cut" to the "entire process" is vague in that it is not clear whether this includes number portability or whether it is limited to the physical process of transferring a customer. The term "batch" is vague in that it is unclear how many lines or customers constitute a "batch" or whether conversion of a single customer with several accounts would constitute a "batch." BellSouth's use of the term "individual hot cut" is vague in that it is defined with reference to "batch hot cuts," which is itself vague and ambiguous. BellSouth's definitions of "coordinated cut over" and "coordinated time-specific cut over" are vague and ambiguous. The distinctions among BellSouth's definitions for "hot cuts," "individual hot cuts," "coordinated cut overs" and "coordinated time-specific cut overs" are unclear. Thus, such discovery is over broad and it would be unduly burdensome for PBT to respond to such ambiguous discovery. PBT further objects to BellSouth's use of such terms as they apply to BellSouth's individual hot cut process as PBT is not privy to each and every process or procedure employed by BellSouth in implementing such hot cuts.

9. PBT objects to BellSouth's definition of "business case" as vague and overly

broad.

10. PBT objects to BellSouth's definition of "voice grade equivalent lines" as vague and ambiguous and subject to differing interpretations.

11. PBT objects to the definitions for "qualifying service" and "non-qualifying service," and each and every interrogatory or request for production that includes such terms, as PBT does not use such terms in the ordinary course of business and answering in these terms would require PBT to provide a legal interpretation of the FCC's terms. With the exception of the specific services the FCC has designated as qualifying or non-qualifying, the term is not clearly defined by the FCC or by BellSouth. For example, as the FCC stated in footnote 466 of the TRO, "Our list is intended to identify general categories of services that would qualify as eligible services. It is not intended to be an exhaustive list or to identify services in a more particular manner." Thus, such discovery is overly broad and it would be unduly burdensome for PBT to respond to such ambiguous discovery.

12. PBT objects to BellSouth's Interrogatories to the extent they seek information related to special access circuits purchased out of BellSouth's interstate tariff rather than to unbundled network elements.

13. PBT objects to BellSouth's Interrogatories to the extent that the information requested constitutes "trade secrets" or to the extent that the information requested would require the disclosure of customer specific information.

14. PBT objects to BellSouth's Interrogatories to the extent that they seek information regarding PBT's operations in ILEC service areas other than BellSouth ILEC service areas within the State of South Carolina, as such information is irrelevant to

BellSouth's case in this docket and such discovery is overly broad and unduly burdensome.

15. PBT objects to BellSouth's Interrogatories to the extent they seek information regarding PBT's projections regarding future services, revenues, marketing, strategies, equipment deployments, or other such future business plans, as such information constitutes trade secrets and, for purposes of this proceeding, would be highly speculative and irrelevant to the issues to be decided in this docket. Moreover, PBT's future plans are irrelevant because the TRO concerns a hypothetical CLEC.

RESPONSES

Subject to the foregoing objections, PBT respectfully submits the following responses and specific objections to BellSouth's Interrogatories.

INTERROGATORY NO. 1

Identify each switch owned by Company that Company uses to provide a qualifying service anywhere in South Carolina, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 5, 11, and 14 as if set forth herein verbatim. Subject to, and without waiving its objections, PBT states the following. PBT owns one switch which it uses to provide service in South Carolina.

INTERROGATORY NO. 2

For each switch identified in response to Interrogatory No. 1, please:

- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS 100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 5, 7, 10, 13, and 14 as if set forth herein verbatim. Subject to, and without waiving its objections, PBT states the following.

PBT's switch is a Next Level switch, CLLI Code BTBGSCBBRS0, located at 113 Shealy Road, Batesburg, South Carolina.

INTERROGATORY NO. 3

Identify any other switch not previously identified in Interrogatory No. 1 that Company uses to provide a qualifying service anywhere in South Carolina, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Interrogatory, do not include ILEC switches used by Company either on an unbundled or resale basis.

RESPONSE:

PBT does not have a switch, other than the one identified in response to Interrogatory No. 1, that it uses to provide service in South Carolina.

INTERROGATORY NO. 4

For each switch identified in response to Interrogatory No. 3, please:

- (a) identify the person that owns the switch;
- (b) provide the Common Language Location Identifier ("CLLI") code of the switch;
- (c) provide the street address, including the city and state in which the switch is located;
- (d) identify the type of switch by manufacturer and model (e.g., Nortel DMS 100);
- (e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;

- (f) identify all documents referring or relating to the rates, terms, and conditions of Company's use of the switch; and
- (g) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

RESPONSE:

See Response to Interrogatory No. 3.

INTERROGATORY NO. 5

Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in South Carolina utilizing any of the switches identified in response to Interrogatory No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 5 and 11 as if set forth herein verbatim. Subject to, and without waiving its objections, PBT states the following. PBT provides service using its own switch in the Batesburg, SC wire center.

INTERROGATORY NO. 6

For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory 1.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 7, 10, and 13 as if set forth herein verbatim.

INTERROGATORY NO. 7

With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voicegrade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voicegrade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voicegrade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voicegrade equivalent lines;

- (e) The number of end user customers to whom you provide five (5) voicegrade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voicegrade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voicegrade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voicegrade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voicegrade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m)The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

See Response to Interrogatory No. 6.

INTERROGATORY NO. 8

Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in South Carolina utilizing any of the switches identified in response to Interrogatory No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

RESPONSE:

See Response to Interrogatory No. 3.

INTERROGATORY NO. 9

For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory No. 3.

RESPONSE:

See Response to Interrogatory No. 3.

INTERROGATORY NO. 10

With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 9, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voicegrade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voicegrade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voicegrade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voicegrade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voicegrade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voicegrade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voicegrade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voicegrade equivalent lines;

- (j) The number of end user customers to whom you provide ten (10) voicegrade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m)The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

See Response to Interrogatory No. 3.

INTERROGATORY NO. 11

Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in South Carolina using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE:

PBT does not provide any service in BellSouth's ILEC service areas in South Carolina on an unbundled or resale basis.

INTERROGATORY NO. 12

For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

RESPONSE:

See Response to Interrogatory No. 11.

INTERROGATORY NO. 13

With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 12, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voicegrade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voicegrade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voicegrade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voicegrade equivalent lines;

- (e) The number of end user customers to whom you provide five (5) voicegrade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voicegrade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voicegrade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voicegrade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voicegrade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m)The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

See Response to Interrogatory No. 11.

INTERROGATORY NO. 14

Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region? If the answer to this Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:

- (a) Provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) Provide the street address, including the city and state in which the switch is located;
- (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS 100);
- (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) Identify all documents referring or relating to the rates, terms, and " conditions of Company's provision of switching capability.

RESPONSE:

PBT adopts and incorporates its General Objections 1, 7, 11, and 14 as if set forth herein verbatim. Subject to, and without waiving its objections, PBT states the following.

PBT does not provide or offer to provide switching capacity to another local exchange carrier for its use in providing service in BellSouth ILEC areas.

INTERROGATORY NO. 15

Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) selfprovisioned switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 2, 3, 4, 7, 9, 11, 13, 14, and 15 as if set forth herein verbatim.

INTERROGATORY NO. 16

Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 2, 3, 4, 7, 9, 11, 13, 14, and 15 as if set forth herein verbatim.

INTERROGATORY NO. 17

If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 2, 3, 4, 7, 9, 11, 13, 14, and 15 as if set forth herein verbatim.

INTERROGATORY NO. 18

Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in South Carolina? If the answer to this Interrogatory is in the affirmative, please:

- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS 100);

- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in South Carolina.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 5, 7, 11, 13, 14, and 15 as if set forth herein verbatim. Subject to, and without waiving its objections, PBT states the following. PBT does not own a switch that is not presently being used to provide telecommunications service in South Carolina.

INTERROGATORY NO. 19

Identify each MSA in South Carolina where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE:

PBT restates, adopts and incorporates its General Objection 11 as if set forth herein verbatim. Subject to, and without waiving its objections, PBT states the following. PBT currently offers telecommunications service in the Columbia, SC MSA.

INTERROGATORY NO. 20

If you offer a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE:

PBT does not currently offer telecommunications service outside the Columbia MSA.

INTERROGATORY NO. 21

Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a

sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 5 and 11 as if set forth herein verbatim. Subject to, and without waiving its objections, PBT states the following. PBT maintains tariffs on file with the Public Service Commission of South Carolina. Those tariffs constitute public information, and contain the information requested in this Interrogatory.

INTERROGATORY NO. 22

Identify each MSA in South Carolina where you are currently offering a nonqualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 3, 4, 7, 11, and 14 as if set forth herein verbatim.

INTERROGATORY NO. 23

If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing

maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE:

See Response to Interrogatory No. 22.

INTERROGATORY NO. 24

Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

RESPONSE:

See Response to Interrogatory No. 22.

INTERROGATORY NO. 25

Please state the total number of end users customers in the State of South Carolina to whom you only provide qualifying service.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 7, 11, and 14 as if set forth herein verbatim.

INTERROGATORY NO. 26

For those end user customers to whom you only provide qualifying service in the State of South Carolina, please state the average monthly revenues you receive from each such end user customer.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 7, 11, 13, and 14 as if set forth herein verbatim.

INTERROGATORY NO. 27

For those end user customers to whom you only provide qualifying service in the State of South Carolina, please state the average number of lines that you provide each such end user customer.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 7, 11, 13, and 14 as if set forth herein verbatim.

INTERROGATORY NO. 28

Please state the total number of end users customers in the State of South Carolina to whom you only provide non-qualifying service.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 7, 11, 13, and 14 as if set forth herein verbatim.

INTERROGATORY NO. 29

For those end user customers to whom you only provide non-qualifying service in the State of South Carolina, please state the average monthly revenues you receive from each such end user customer.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 7, 11, 13, and 14 as if set forth herein verbatim.

INTERROGATORY NO. 30

Please state the total number of end users customers in the State of South Carolina to whom you provide both qualifying and non-qualifying service.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 7, 11, 13, and 14 as if set forth herein verbatim.

INTERROGATORY NO. 31

For those end user customers to whom you provide qualifying and non-qualifying service in the State of South Carolina, please state the average monthly revenues you receive from each such end user customer.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 7, 11, 13, and 14 as if set forth herein verbatim.

INTERROGATORY NO. 32

For those end user customers to whom you provide qualifying and non-qualifying service in the State of South Carolina, please state the average number of lines that you provide each such end user customer.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 7, 11, 13, and 14 as if set forth herein verbatim.

INTERROGATORY NO. 33

Please provide a breakdown of the total number of end user customers served by Company in South Carolina by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide another type of classification, define and describe with specificity the classification so that it can be determined what kinds of customers you have in each classification).

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 7, 13, and 14 as if set forth herein verbatim.

INTERROGATORY NO. 34

For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

RESPONSE:

See Response to Interrogatory No. 33. Subject to these objections, PBT states as follows. PBT does not track this information.

INTERROGATORY NO. 35

For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

RESPONSE:

See Response to Interrogatory No. 33. Subject to these objections, PBT states as follows. PBT does not track this information.

INTERROGATORY NO. 36

For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 5, 7, 13, and 14 as if set forth herein verbatim. Subject to, and without waiving its objections, PBT states the following. PBT is not privy to the number of customers or lines served by BellSouth or any other provider of

local exchange service in a given market and, therefore, is in no better or worse position than is BellSouth to estimate PBT's "share" of a particular local exchange market.

INTERROGATORY NO. 37

Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in South Carolina.

RESPONSE:

See Response to Interrogatory No. 36.

INTERROGATORY NO. 38

Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in South Carolina.

RESPONSE:

See Response to Interrogatory No. 36. In addition, PBT restates, adopts and incorporates its General Objection 15 as if set forth herein verbatim.

INTERROGATORY NO. 39

Describe how the marketing organization that is responsible for marketing qualifying service in South Carolina is organized, including the organization's structure, size in terms of full time or

equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing efforts in South Carolina; and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 4, and 7 as if set forth herein verbatim. Subject to these objections, PBT states as follows. PBT has one marketing employee, and currently conducts no marketing with respect to its services in BellSouth's ILEC service area in South Carolina.

INTERROGATORY NO. 40

How do you determine whether you will serve an individual customer's location with multiple DSOs or whether you are going to use a DS 1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors that you would consider in making this type of a decision.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 3, 4, 7, 13, 14, and 15 as if set forth herein verbatim. Subject to these objections, PBT states as follows. All facilities used by PBT to provide service in BellSouth's ILEC service area are owned by PBT, and PBT does not use large transmission systems.

INTERROGATORY NO. 41

Is there a typical or average number of DSOs at which you would chose to serve a particular customer with a DS 1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.

RESPONSE:

See Response to Interrogatory No. 40.

INTERROGATORY NO. 42

What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DSOs? For instance, if a customer had 10 DSOs, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DSOs? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS 1 rather than multiple DSOs.)

RESPONSE:

See Response to Interrogatory No. 40.

INTERROGATORY NO. 43

What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 3, 4, 7, 11, 13, 14, and 15 as if set forth herein verbatim.

INTERROGATORY NO. 44

With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

RESPONSE:

See Response to Interrogatory No. 43.

INTERROGATORY NO. 45

In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over which you evaluate the project?

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 4, 7, 11, 13, 14, and 15 as if set forth herein verbatim. Subject to, and without waiving its objections, PBT states the following. The time horizon PBT would use to evaluate whether to offer a particular service in a particular geographic market will vary depending on the characteristics of both the proposed service and the particular geographic market.

INTERROGATORY NO. 46

Provide your definition of sales expense as that term is used in your business.

RESPONSE:

PBT does not have a set definition of "sales expense" for internal purposes.

INTERROGATORY NO. 47

Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

RESPONSE:

See Response to Interrogatory No. 46.

INTERROGATORY NO. 48

Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

RESPONSE:

PBT does not have a set definition for "general and administrative (G&A) costs" for internal purposes.

INTERROGATORY NO. 49

Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

RESPONSE:

See Response to Interrogatory No. 48.

INTERROGATORY NO. 50

For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for Company in each state in BellSouth's region.

RESPONSE:

PBT restates, adopts and incorporates its General Objection 8 as if set forth herein verbatim. Subject to, and without waiving its objections, PBT states the following. PBT has ordered no individual hot cuts from BellSouth.

INTERROGATORY NO. 51

For each individual hot cut identified in response to Interrogatory No. 50, state:

- i. Whether the hot cut was coordinated or not;
- ii. If coordinated, whether the hot cut occurred as scheduled;
- iii. If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, Company, the end-user customer, or some third party, and describe with specificity the reason the hot cut did not occur as scheduled;
- iv. If there was a problem with the hot cut, state whether Company complained in writing to BellSouth or anyone else.

RESPONSE:

See Response to Interrogatory No. 50.

INTERROGATORY NO. 52

Does Company have a preferred process for performing batch hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 53

Does Company have a preferred process for performing individual hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 54

If Company has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in Company's process that differs from BellSouth's process.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 55

If Company has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in Company's process that differs from BellSouth's process:

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 56

Does Company have any estimates of what a typical individual hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 57

Does Company have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT

reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 58

What is the largest number of individual hot cuts that Company has requested in any individual central office in each of the nine BellSouth states on a single day? In answering this Interrogatory, identify the central office for which the request was made, and the number of hot cuts that were requested. State with specificity what the outcome was for each of the hot cuts in each of the central offices so described, if not provided in response to an earlier interrogatory.

RESPONSE:

See Response to Interrogatory No. 50.

INTERROGATORY NO. 59

Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT

reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 60

Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 61

Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT

reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 62

Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 63

Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT

reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 64

Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 65

Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT

reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 66

Does any ILEC outside the BellSouth region have a rate for an individual hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE:

PBT currently has no suggestions or preferences with respect to processes or rates, due to a lack of experience with BellSouth in this area. See Response to Interrogatory No. 50. However, PBT reserves the right to provide input on these issues during the course of this proceeding as appropriate.

INTERROGATORY NO. 67

Does Company order coordinated or non-coordinated hot cuts?

RESPONSE:

See Response to Interrogatory No. 50.

INTERROGATORY NO. 68

Does Company use the CFA database?

RESPONSE:

PBT is unfamiliar with the term CFA database. To the extent BellSouth desires a response to this interrogatory, PBT requests clarification of the term.

INTERROGATORY NO. 69

Identify every issue related to BellSouth's hot cut process raised by Company at the South Carolina CLEC collaborative since October 2001.

RESPONSE:

PBT raised no such issues, due to a lack of experience with BellSouth in this area.

INTERROGATORY NO. 70

What is the appropriate volume of loops that you contend the South Carolina Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 71

What is the appropriate process that you contend the South Carolina Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 72

If Company disagrees with BellSouth's individual hot cut process, identify every step that Company contends is unnecessary and state with specificity why the step is unnecessary.

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 73

If Company disagrees with BellSouth's bulk hot cut process, identify every step that Company contends is unnecessary and state with specificity why the step is unnecessary.

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 74

Identify by date, author and recipient every written complaint Company has made to BellSouth regarding BellSouth's hot cut process since October 2001.

RESPONSE:

PBT has made no such written complaints. See Response to Interrogatory No. 50.

INTERROGATORY NO. 75

How many unbundled loops does Company contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 76

What is the appropriate information that you contend the South Carolina Public Service Commission should consider in evaluating whether the ILEC is capable of migrating multiple

lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 77

What is the average completion interval metric for provision of high volumes of loops that you contend the South Carolina Public Service Commission should require in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 78

What are the rates that you contend the South Carolina Public Service Commission should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 79

What are the appropriate product market(s) that you contend the South -Carolina Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 80

What are the appropriate geographic market(s) that you contend the South Carolina Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 81

Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 82

Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular

market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 83

What is the maximum number of DSO loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multiline end users at a single location that the South Carolina Public Service Commission should consider in establishing a "cutoff" consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention:

RESPONSE:

PBT has not taken a position on this issue at this time, but reserves the right to provide input to the Commission during the course of this proceeding as may be appropriate.

INTERROGATORY NO. 84

Identify each market in the U.S. where you provide local telephone service, the year and month when you first offered local exchange service, the type of customers (residence or business) you serve, and the number of lines served in each market.

RESPONSE:

PBT restates, adopts and incorporates its General Objections 1, 3, 4, 7, and 14 as if set forth herein verbatim.

All objections to the foregoing interrogatories were provided by the undersigned counsel. Substantive responses to all of the foregoing interrogatories were provided by L. B. Spearman, PBT Communications, Inc., 1660 Juniper Springs Road, Gilbert, South Carolina 29054.

Respectfully submitted this 14th day of January, 2004.

/s/ _____
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